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**VIA ECF**

Hon. Lorna G. Schofield, U.S. District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Global Gaming Philippines, LLC v. Razon, Jr., et al., 21 Cv. 2655 (LGS)(SN)*/**  
**Motion for Leave to File Under Seal**

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Dear Judge Schofield:

On behalf of Plaintiff Global Gaming Philippines, LLC (“Plaintiff”), and pursuant to (a) the Stipulated Confidentiality Order (ECF No. 95), and (b) confidentiality designations made by counsel for Defendants, we respectfully request leave to redact portions of Plaintiff’s Response to Defendants’ Pre-Motion Letters (ECF Nos. 314 and 315) (“Plaintiff’s Response”).

Plaintiff makes this application because counsel for Defendants have designated deposition testimony which is referenced and described in Plaintiff’s Response as “Confidential” or “Highly Confidential” pursuant to the Stipulated Confidentiality Order (ECF No. 95).

Paragraph 11 of the Confidentiality Order provides: “Documents may be filed under seal only as provided in Judge Schofield’s Rule I.D.3,” which provides that the parties with an interest in confidential treatment, here, the Defendants, bear the burden of persuasion. Plaintiff seeks leave to file its Response under seal to comply with the Confidentiality Order.

Respectfully submitted,

/s/ Kaitlyn A. Crowe

cc: All Counsel of record (via ECF)